

525 Clinton Street
Bow, NH 03304
Voice: 603-228-2830
Fax: 603-228-2464



61 Elm Street
Montpelier, VT 05602
Voice: 802-229-0002
Fax: 802-223-2336

December 6, 2018

Commissioner Cory Gustafson
Department of Vermont Health Access
State of Vermont
NOB 1 South, 280 State Drive
Waterbury, VT 05671-1010

Dear Commissioner Gustafson,

Thank you for the opportunity to provide comment on the recently released Global Commitment Register 18-111: Reimbursement for Federally Qualified Health Centers (FQHCs) and Rural Health Clinics (RHCs).

Established in 1986, Bi-State Primary Care Association is a nonpartisan, nonprofit 501(c)(3) charitable organization that promotes access to effective and affordable primary care and preventive services for all, with special emphasis on underserved populations in Vermont and New Hampshire. Bi-State's combined Vermont membership includes 12 FQHCs and 1 RHC delivering primary care at over 50 sites and serving over 170,000 patients.

Bi-State appreciates the commitment and dedication of DVHA and the reimbursement staff to work together on the Prospective Payment System (PPS) rate methodology and ensure annual reimbursement updates are processed in a timely manner. We especially appreciate the manner in which DVHA engaged Bi-State supporting a collaborative resolution for those FQHCs and RHCs for whom the proposed 2019 PPS rate is lower than the Alternative Payment Methodology (APM) rate. We also understand that DVHA's reimbursement unit wants to ensure those FQHCs and RHCs that are participating in a Medicaid ACO-based Next Gen program for 2019 notify the reimbursement unit about that participation. The proposed Global Commitment Register reflects all of these conversations and acknowledges the complexity of the rate methodology used to support critical primary and preventive services.

We look forward to continued engagement with you on these issues in the future.

Sincerely,

A handwritten signature in dark ink, appearing to be "gm" followed by a long horizontal stroke.

Georgia J. Maheras, Esq.
VP, Policy and Programs